

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CONNECTION DISTRIBUTING CO.,
et al.,

Plaintiffs,

Case No. 1:95 CV 1993

Judge Manos

v.

THE HONORABLE ALBERTO R.
GONZALEZ, Attorney General of the
United States,
Defendant.

DECLARATION OF KRISTI WITSMAN

I, KRISTI WITSMAN, hereby declare and present the following sworn direct testimony in this action as follows:

1. I am a computer forensic specialist, employed by the Child Exploitation and Obscenity Section of the Criminal Division of the United States Department of Justice. In that capacity, I am responsible for conducting and supporting online investigations and forensically analyzing computer evidence in computer-related child pornography and obscenity crimes. I am familiar with websites providing adult oriented-material, including sites depicting sexually-explicit conduct and am experienced in searching the Internet to locate adult-oriented websites.

2. At the request of counsel for the Department of Justice in this action, on August 22-24, 2005, I accessed the web-site www.adultfriendfinder.com, which describes itself as the "World's Largest Sex and Swingers Personals Site." The site allows members to post personal ads and to search for other members with certain characteristics.

3. At the request of counsel, I downloaded the website's 18 U.S.C. § 2257 statement, which is defendant's exhibit B. I also ran various searches on the site. Those searches identified (1) couples in Ohio who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting women; (2) couples in Ohio who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting men; (3) couples in Ohio who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting couples. The print-outs of the results of those searches are, respectively, defendant's exhibits C to E.

4. At the request of counsel, I also ran searches identifying (1) couples in the United States who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting women; (2) couples in the United States who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting men; (3) couples in the United States who state that at least one member of the couple is between the ages of 18 and 21 and that they have an interest in meeting couples. The number of personal ads obtained with each search was, respectively, over 12,500, 3,213, and over 10,000. Once I reached 12,500 and 10,000 respectively, I stopped reviewing the results of the search for the first and third categories because of the significant time involved in reviewing those results.

5. I also accessed the website www.connectionline.com on August 22, 2005, and printed the website's 18 U.S.C. § 2257 statement, terms and conditions page, and a page that offers members a discount if they post magazine ads. Those documents are, respectively, defendant's exhibits F to H.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed
on August 24, 2005.


KRISTI WITSMAN